

**IN THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

OCEANA, Inc.,)	
)	
Appellant,)	
)	
v.)	No. 17-5247
)	
WILBUR ROSS, in his official capacity as)	
Secretary of the United States Department)	
of Commerce, <i>et al.</i> ,)	
)	
Appellees.)	
_____)	

UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE APPELLANT'S PRINCIPAL BRIEF

Pursuant to Federal Rule of Appellate Procedure 26(b) and D.C. Circuit Rule 28(e), Appellant Oceana, Inc., hereby moves for an extension of time within which to file its principal brief. That brief is currently due January 31, 2018. Oceana respectfully requests that the deadline for filing the principal brief be extended 30 days, to and including March 2, 2018. Counsel for Oceana has conferred with counsel for Appellees, and counsel for Appellees does not oppose the requested extension.

This is Oceana's first request for an extension. The extension is necessary in light of counsel's previously scheduled travel and the heavy press of other matters that counsel currently has pending before federal and state courts, including but not limited to response briefs due in the U.S. Courts of Appeals for the Ninth and

Second Circuits on January 19 and 23, 2018, respectively, a reply brief due in the Oregon Supreme Court on January 18, 2018, and an opening brief due in the Alabama Supreme Court on January 19, 2018.

This motion is made in good faith and not for the purpose of delay. Appellees do not oppose the requested extension. Accordingly, for the reasons stated herein, Oceana respectfully requests that this motion be granted and that the due date for filing its principal brief be extended to and including March 2, 2018.

Respectfully submitted,

/s/ James E. Tysse

James E. Tysse

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Counsel for Appellant

January 4, 2018

CERTIFICATE OF COMPLIANCE

I hereby certify that the foregoing motion, prepared in a proportionally spaced typeface using Microsoft Word in 14-point Times New Roman type style, contains 223 words, and thus complies with the type-volume limitations of Federal Rule 27(d).

/s/ James E. Tysse

James E. Tysse

CORPORATE DISCLOSURE STATEMENT

Pursuant to Federal Rule of Appellate Procedure 26.1 and D.C. Circuit Rules 26.1 and 27(a)(4), Appellant respectfully submits the following corporate disclosure statement:

Oceana, Inc. does not have a parent corporation.

No person or corporate entity owns ten percent or more of Oceana, Inc.'s stock.

CERTIFICATE OF SERVICE

I hereby certify that on January 4, 2018, I served the foregoing document upon counsel of record by filing a copy of the document with the Clerk through the Court's electronic docketing system.

/s/ James E. Tysse

James E. Tysse